

**REMARKS**

This Application has been carefully reviewed in light of the final Office Action transmitted March 22, 2007 (the "Office Action"). At the time of the Office Action, Claims 1-20 were pending in the application. The Office Action rejects Claims 1-20. Applicants amend Claims 1, 5, 9, 10, 16 and 20. Applicants respectfully request reconsideration and favorable action in this case.

**Section 103 Rejections**

The Examiner rejects Claims 1-5, 7, 10-13, 16, 17 and 20 under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,201,554 to Lands ("*Lands*") in view of U.S. Patent No. 6,573,883 issued to Bartlett ("*Bartlett*"). The Examiner rejects Claims 6, 9, 15 and 19 under 35 U.S.C. 103(a) as being unpatentable over *Lands* and *Bartlett* as applied to Claims 1, 10 and 16 above, and further in view of U.S. Patent Publication No. 2002/0190947 to Feinstein ("*Feinstein*"). The Examiner rejects Claims 8, 14, and 18 under 35 U.S.C. 103(a) as being unpatentable over *Lands* and *Bartlett* as applied to Claims 1, 10 and 16 above, and further in view of WO 01/86920 to Lapidot ("*Lapidot*"). Applicants respectfully traverse these rejections.

Amended Claim 1 recites a display control module with first and second modes of motion input operation. The display control module in the first mode of motion input operation is operable to monitor motion of a device and modify a current image based on the resulting location of the device as compared to an initial location of the device prior to the motion of the device. The display control module in the second mode of motion input operation is operable to monitor motion of the device and compare a path traveled by the device identified by tracked movement of the device with gestures to identify a matching gesture. Claim 1 also recites a mode selection module operable to detect a mode selection trigger and to switch between the first mode of motion input operation and the second mode of motion input operation. Claims 10, 16 and 20 recite similar elements.

*Lands* does not disclose each of these elements. For example, *Lands* does not disclose a display control module having first and second modes of motion input operation. *Lands*

merely discloses first and second sensors 36 and 38, respectively, that transmit signals indicative of a current angle and direction of tilt of a device which are then compared to a reference tilt by a CPU 44. *See, e.g., Lands*, col. 3, lines 54-64 and col. 4, lines 30-45. *Lands* only discloses one mode of motion detection operation – that discussed above related to sensing a direction and tilt and comparing it to a reference tilt. *Lands* does not disclose two modes of motion input operation (e.g., one that modifies a current image based on the resulting location of the device as compared to an initial location of the device prior to the motion of the device and another that compares a path traveled by the device identified by tracked movement of the device with gestures to identify a matching gesture). The only multiple modes of operation disclosed in *Lands* are not motion input modes but paging, volume control, brightness control and zooming modes.

Moreover, *Lands* does not disclose Claim 1 a mode selection module operable to detect a mode selection trigger and to switch between multiple modes of motion input operation.

*Bartlett* does not cure the deficiencies of *Lands*, as *Bartlett* neither discloses multiple modes of input operation or a mode selection trigger for switching between multiple modes of motion input operation.

Therefore, for at least these reasons, Applicants respectfully submit that Claims 1, 10, 16 and 20 are patentable over the cited art used in the rejections and request that the rejections of these claims be withdrawn.

Claims 2-9 each depends from Claim 1, Claims 11-15 each depends from Claim 10 and Claims 17-19 each depends from Claim 16. Thus, for at least the reasons discussed above with respect to Claims 1, 10 and 16, Applicants respectfully request that the rejections of Claims 2-9, 11-15 and 17-19 be withdrawn.

**CONCLUSION**

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully request full allowance of all pending claims.

If the Examiner feels that a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Chad C. Walters, Attorney for Applicants, at the Examiner's convenience at (214) 953-6511.

The Commissioner is hereby authorized to charge \$790.00 in payment of the required fee to file a Request for Continued Examination, any other fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

BAKER BOTTS L.L.P.  
Attorneys for Applicants

A handwritten signature in black ink, appearing to read 'Chad C. Walters', with a stylized flourish at the end.

Chad C. Walters  
Reg. No. 48,022

Date: June 22, 2007

**CORRESPONDENCE ADDRESS:**

at Customer No.

**05073**